Exhibit A

Case: 4:16-cv-00172-SNLJ Doc. #: 100-2 Filed: 04/14/17 Page: 2 of 4 PageID #: 1100

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

RONALD McALLISTER,

Plaintiff,

V.

Case No. 4:16-cv-00172-SNLJ

THE ST. LOUIS RAMS, LLC,

Defendant.

This pleading is filed only with respect to McAllister v. The St. Louis Rams, LLC

DECLARATION OF RONALD McALLISTER

- I, Ronald McAllister, hereby declare as follows:
- 1. I am over 21 years of age, a citizen of the State of Missouri residing in St. Louis County, and have personal knowledge of the facts contained in this declaration. If called as a witness I would competently testify to these facts. I submit this declaration in support of my Motion for Class Certification.
- 2. I am the owner of a St. Louis Rams Personal Seat License (PSL), which I purchased from FANS, Inc. in 1995 before the Rams moved to St. Louis, and a second PSL, which I purchased from the Rams in 2005. I purchased and used the PSLs for personal, family and household purposes. I paid \$1,000.00 for each PSL and used them to purchase season tickets from the RAMS for 21 consecutive seasons through the 2015 football season. I used that season ticket to attend Rams football games.
- 3. I am the named Plaintiff in this action, *Ronald McAllister v. The St. Louis Rams*, LLC, brought on my own behalf and on behalf of all the other similarly situated persons and entities who purchased PSLs for Rams' games prior to the beginning of the 1995 Rams Football season in St. Louis, and maintained those PSLs through 2015. With my purchases I was

provided with the attached Ex. 1 and Ex. 2, entitled "Standard Terms and Conditions of Regular Patron CPSL Agreement," and Regular Patron CPSL Agreement, respectively.

- 4. My PSLs allowed me to purchase season tickets to Rams football games played in St. Louis for 30 years, through the 2024 NFL football season. However, the Rams terminated my PSLs prior to the 2016 season when the team moved to Los Angeles, California. The Rams have not reimbursed me, or any other PSL owner to my knowledge, for the unusable portion of the PSLs.
- 5. I have brought this class action lawsuit for my personal claim and as a representative of other individuals and entities who also purchased Rams PSL's from FANS, Inc. in 1995 and maintained ownership of their PSL's throughout the 2015 NFL football season. I understand that I am moving for certification of the following Class and Subclass:

FANS Class. All persons or entities who bought one or more PSLs from FANS, Inc. and continued to be PSL owners at the end of the 2015 season.

FANS MMPA Subclass. All natural persons who are members of the FANS Class.

Rams Class. All persons or entities who bought one or more PSLs from the St. Louis Rams and continued to be PSL owners at the end of the 2015 season.

Rams MMPA Subclass. All natural persons who are members of the Rams Class.

Because I am a natural person who bought PSLs from FANS, Inc. and the Rams and continued to be a PSL owner at the end of the 2015 season, I understand that I am a member of these classes and subclasses.

6. I understand that, as representative of this class action, I represent the interests of all similarly situated class members in this litigation. In pursuing this case, I consider the interests of the class just the same as I consider my own interests.

7. I am familiar with the Complaint filed in this action, the pleadings and motions filed by each party, as well as the ruling of the court.

8. I have agreed to serve as the class representative in this case and I agree to actively participate in this litigation. I understand that I may be asked to testify at deposition and trial, answer written interrogatories, produce documents, and stay generally aware of the status and progress of the lawsuit.

9. For myself, and for members of the class, I seek the same type of monetary damages based upon the same PSL contracts for the same legal reasons and violations of the law. While I have a general understanding of this lawsuit, I will rely upon the expertise of my lawyers for legal guidance.

- 10. My interests are not antagonistic to the other class members and I am unaware of any interests I might have that would conflict with the interests of the class.
- 11. Since I purchased my first PSL in 1995, I know the Rams have kept up with my mailing address and email address by sending me correspondence to my residential address and my email address. I believe the Rams have also kept up with the mailing addresses and email addresses of the other members of the class as well.
- 12. I am interested in the progress of this lawsuit and I will cooperate with my lawyers and the Court throughout this litigation.

I declare under penalty of perjury under the laws of the United States of America, that the foregoing is true and correct.

Executed on April 13TH, 2017 in St. Louis County, Missouri.

Ronald McAllister

Ronald McAllister